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*Attorneys for Tik Tek Marketing S de RL de CV*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

FOREO, INC.,  
Plaintiff,  
  
v.  
  
TIK TEK MARKETING S DE RL DE CV,  
Defendant.

Case No. 2:20-cv-1690-JCM-VCF

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING RESPONSIVE  
PLEADING DEADLINE**

Plaintiff Foreo Inc. (“Foreo”) and Defendant Tik Tek Marketing S de RL de CV (“Tik Tek”), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. This action was filed on September 11, 2020. (See ECF No. 1.)

<sup>1</sup> Pursuant to LR IA 11-2(e), Messrs. Zeballos and Molina certify that they will comply with LR IA 11-2 within 14 days.

1       2. On April 19, 2022, Matthew C. DeFrancesco, counsel for Foreo, and Marco  
 2 Molina, counsel for Tik Tek, discussed the status of this matter, including service of the summons  
 3 and complaint on Tik Tek and Tik Tek's need to retain local counsel.

4       3. On May 2, 2022, counsel stipulated to waive service and extend the deadline by  
 5 which Tik Tek must file a responsive pleading. On May 3, the Court granted the parties'  
 6 stipulation and extended Tik Tek's responsive pleading deadline to June 20, 2022.

7       4. The parties have stipulated and agreed to a brief, one-week extension to the  
 8 responsive pleading deadline.

9       5. As the responsive pleading deadline has not yet passed, this stipulation must be  
 10 supported by good cause. Counsels' caseloads and schedules, together with Tik Tek's counsel  
 11 falling ill, constitute good cause for the brief extension, particularly because no other dates or  
 12 deadlines have been established in this matter.

13       6. The parties stipulate and agree that Tik Tek's responsive pleading would be due  
 14 on or before June 27, 2022.

15       7. The parties further stipulate and agree that, in the event Tik Tek files a Motion to  
 16 Dismiss the Complaint, Foreo shall have until August 3, 2022, to oppose such Motion, if any.

17       Dated this 16th day of June 2022

18       \_\_\_\_\_  
 19       /s/ *Matthew C. DeFrancesco*  
 FISHERBROYLES, LLP

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22       Matthew C. DeFrancesco  
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24       Attorneys for Plaintiff

18       Dated this 16th day of June 2022

19       \_\_\_\_\_  
 20       /s/ *Steven E. Kish III*  
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## **ORDER**

The Court has reviewed the stipulation of the parties and finds good cause exists to grant the same. Accordingly,

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Defendant shall have up to and including **June 27, 2022**, to file their responsive pleadings.

Dated: June 17 , 2022

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United States Magistrate Judge

**HOWARD & HOWARD ATTORNEYS PLLC**

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify I am employed in the County of Clark, State of Nevada, am over the age  
3 of 18 years and not a party to this action. My business address is Howard & Howard Attorneys  
4 PLLC, 3800 Howard Hughes Parkway, Suite 1000, Las Vegas, Nevada, 89169.

5                   I served the foregoing, **STIPULATION AND [PROPOSED] ORDER EXTENDING**  
6 **RESPONSIVE PLEADING DEADLINE (SECOND REQUEST)**, in this action or  
7 proceeding electronically with the Clerk of the Court via the Court's filing system, which will  
8 cause this document to be served upon the following counsel of record:

9                   FISHERBROYLES, LLP

10                  Rob Phillips  
11                  5670 Wilshire Blvd, Suite 1800  
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15                  Matthew C. DeFrancesco  
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19                  Matthew.DeFrancesco@fisherbroyles.com  
20                  *Attorneys for Defendants*

21                  I certify under penalty of perjury the foregoing is true and correct, and this Certificate of  
22 Service was executed by me on June 16, 2022, at Las Vegas, Nevada.

23                  By:     /s/ Steven E. Kish III  
24                  An employee of Howard & Howard Attorneys PLLC